

1 John J. Edmonds (State Bar No. 274200)
2 jedmonds@cepiplaw.com
3 COLLINS EDMONDS POGORZELSKI
4 SCHLATHER & TOWER, PLLC
5 1851 East First Street, Suite 900
6 Santa Ana, California 92705
7 Telephone: (951) 708-1237
8 Facsimile: (951) 824-7901

9
10 Attorney for Plaintiff,
11 **DIGITECH IMAGE TECHNOLOGIES, LLC**

12
13
14 UNITED STATES DISTRICT COURT
15
16 CENTRAL DISTRICT OF CALIFORNIA

17 DIGITECH IMAGE TECHNOLOGIES, LLC,

18 Plaintiff,

19 v.

20 AGFAPHOTO HOLDING GMBH;
21 AGFAPHOTO USA CORPORATION; B&H
22 FOTO & ELECTRONICS CORP.; BEST BUY
23 CO., INC.; BEST BUY STORES, LP;
24 BESTBUY.COM, LLC; BUY.COM INC.;
25 CANON INC.; CANON U.S.A., INC.; CASIO
26 COMPUTER CO., LTD.; CASIO AMERICA,
27 INC.; CDW LLC; FUJIFILM
28 CORPORATION; FUJIFILM HOLDINGS
CORPORATION; FUJIFILM HOLDINGS
AMERICA CORPORATION; GENERAL
ELECTRIC COMPANY; GENERAL
IMAGING COMPANY; VICTOR
HASSELBLAD AB; HASSELBLAD USA
INC.; LEICA CAMERA AG; LEICA
CAMERA INC.; MAMIYA DIGITAL
IMAGING CO., LTD.; LEAF IMAGING LTD.
D/B/A MAMIYALEAF; MAMIYA AMERICA
CORPORATION; MICRO ELECTRONICS,
INC.; NEWEGG, INC.; NEWEGG.COM,
INC.; NIKON CORPORATION; NIKON INC.;
NIKON AMERICAS, INC.; OLYMPUS
CORPORATION; OLYMPUS AMERICA
INC.; OVERSTOCK.COM, INC.;
PANASONIC CORPORATION; PANASONIC

Case No.: **SACV12-1153 MLG**

**COMPLAINT FOR INFRINGEMENT OF
U.S. PATENT NO. 6,128,415**

DEMAND FOR JURY TRIAL

Complaint Filed: July 16, 2012
Trial Date: not set

2012 JULY 16 10:11 AM
CLERK'S OFFICE
CLERK OF THE
SANTA ANA COURTHOUSE
SANTA ANA, CALIFORNIA
BY

FILED

1 CORPORATION OF NORTH AMERICA;
2 PENTAX RICOH IMAGING CO., LTD.;
3 PENTAX RICOH IMAGING AMERICAS
4 CORPORATION; RICOH COMPANY, LTD.;
5 RICOH AMERICAS CORPORATION;
6 SAKAR INTERNATIONAL, INC. D/B/A
7 VIVITAR; SIGMA CORPORATION; SIGMA
CORPORATION OF AMERICA; SONY
CORPORATION; SONY CORPORATION OF
AMERICA; SONY ELECTRONICS INC. and
TARGET CORPORATION

8 Defendants.

9

10 **COMPLAINT FOR PATENT INFRINGEMENT**

11 This is an action for patent infringement in which DIGITECH IMAGE TECHNOLOGIES,
12 LLC submits this Original Complaint against Defendants named herein, namely AGFAPHOTO
13 HOLDING GMBH; AGFAPHOTO USA CORPORATION; B&H FOTO ELECTRONICS CORP.;
14 BEST BUY CO., INC. D/B/A BEST BUY; BEST BUY STORES, LP; BESTBUY.COM, LLC;
15 BUY.COM INC.; CANON INC.; CANON U.S.A., INC.; CASIO COMPUTER CO., LTD.; CASIO
16 AMERICA, INC.; CDW LLC F/K/A CDWC LLC F/K/A CDW CORPORATION; FUJIFILM
17 CORPORATION; FUJIFILM HOLDINGS CORPORATION; FUJIFILM HOLDINGS AMERICA
18 CORPORATION; GENERAL ELECTRIC COMPANY; GENERAL IMAGING COMPANY;
19 VICTOR HASSELBLAD AB; HASSELBLAD USA INC.; LEICA CAMERA AG; LEICA
20 CAMERA INC.; MAMIYA DIGITAL IMAGING CO., LTD.; LEAF IMAGING LTD. D/B/A
21 MAMIYALEAF; MAMIYA AMERICA CORPORATION; MICRO ELECTRONICS, INC. D/B/A
22 MICRO CENTER; NEWEGG, INC.; NEWEGG.COM, INC.; NIKON CORPORATION; NIKON
23 INC.; NIKON AMERICAS, INC.; OLYMPUS CORPORATION; OLYMPUS AMERICA INC.;
24 OVERSTOCK.COM, INC.; PANASONIC CORPORATION; PANASONIC CORPORATION OF
25 NORTH AMERICA; PENTAX RICOH IMAGING CO., LTD.; PENTAX RICOH IMAGING
26
27
28

1 AMERICAS CORPORATION; RICOH COMPANY, LTD.; RICOH AMERICAS
2 CORPORATION; SAKAR INTERNATIONAL, INC. D/B/A VIVITAR; SIGMA
3 CORPORATION; SIGMA CORPORATION OF AMERICA; SONY CORPORATION; SONY
4 CORPORATION OF AMERICA; SONY ELECTRONICS INC. and TARGET CORPORATION
5 D/B/A TARGET (collectively "Defendants"), as follows:

6

7 **THE PARTIES**

8 1. DIGITECH IMAGE TECHNOLOGIES, LLC ("DIGITECH" or "Plaintiff") is a
9 California limited liability company with a place of business at 500 Newport Center Drive, Suite
10 700, Newport Beach, CA 92660.

11 2. On information and belief, AGFAPHOTO HOLDING GMBH is a foreign company
12 with a place of business at Köln, Germany and AGFAPHOTO USA CORPORATION is a Delaware
13 corporation with a place of business at Ridgefield Park, NJ. Hereinafter, AGFAPHOTO HOLDING
14 GMBH and AGFAPHOTO USA CORPORATION are collectively referred to as "AGFAPHOTO."

15 3. On information and belief, B&H FOTO ELECTRONICS CORP. (hereinafter
16 "B&H") is a New York corporation with a place of business at New York, NY.

17 4. On information and belief, BEST BUY CO., INC. D/B/A BEST BUY is a Minnesota
18 corporation with a place of business at Richfield, MN. On information and belief, BEST BUY
19 STORES, LP is a Minnesota corporation with a place of business at Richfield, MN. On information
20 and belief, BESTBUY.COM, LLC is a Minnesota corporation with a place of business at Richfield,
21 MN. Hereinafter, BEST BUY CO., INC. D/B/A BEST BUY, BEST BUY STORES, LP and
22 BESTBUY.COM, LLC are collectively referred to as "BEST BUY."

23 5. On information and belief, BUY.COM INC. (hereinafter "BUY.COM") is a
24 Delaware corporation with a place of business at Aliso Viejo, CA.

6. On information and belief, CANON INC. is a foreign company with a place of business at Tokyo, Japan and CANON U.S.A., INC. is a New York corporation with a place of business at Lake Success, NY. Hereinafter, CANON INC. and CANON U.S.A., INC. are collectively referred to as "CANON."

7. On information and belief, CASIO COMPUTER CO., LTD. is a foreign company with a place of business at Tokyo, Japan and CASIO AMERICA, INC. is a New York corporation with a place of business at Dover, NJ. Hereinafter, CASIO COMPUTER CO., LTD. and CASIO AMERICA, INC. are collectively referred to as "CASIO."

8. On information and belief, CDW LLC F/K/A CDWC LLC F/K/A CDW CORPORATION is a Delaware corporation with a place of business at Vernon Hills, IL. On information and belief, CDW, INC. is a Delaware corporation with a place of business at Vernon Hills, IL. Hereinafter, CDW LLC F/K/A CDWC LLC F/K/A CDW CORPORATION is referred to as "CDW."

9. On information and belief, FUJIFILM CORPORATION and FUJIFILM HOLDINGS CORPORATION are foreign companies with places of business at Tokyo, Japan and FUJIFILM HOLDINGS AMERICA CORPORATION is a Delaware corporation with a place of business at Valhalla, NY. Hereinafter, FUJIFILM CORPORATION, FUJIFILM HOLDINGS CORPORATION and FUJIFILM HOLDINGS AMERICA CORPORATION are collectively referred to as “FUJIFILM.”

10. On information and belief, GENERAL ELECTRIC COMPANY and GENERAL IMAGING COMPANY are New York and Delaware corporations, respectively, with places of business at Fairfield, CT and Gardena, CA, respectively. Hereinafter, GENERAL ELECTRIC COMPANY and GENERAL IMAGING COMPANY are collectively referred to as "GE."

11. On information and belief, VICTOR HASSELBLAD AB is a foreign company with a
1 place of business at Gothenburg, Sweden and HASSELBLAD USA INC. is a Delaware corporation
2 with a place of business at Redmond, WA. Hereinafter, VICTOR HASSELBLAD AB and
3 HASSELBLAD USA INC. are collectively referred to as "HASSELBLAD."
4

5. On information and belief, LEICA CAMERA AG is a foreign company with a place
6 of business at Solms, Germany and LEICA CAMERA INC. is a Delaware corporation with a place
7 of business at Allendale, NJ. Hereinafter, LEICA CAMERA AG and LEICA CAMERA INC. are
8 collectively referred to as "LEICA."
9

10. On information and belief, MAMIYA DIGITAL IMAGING CO., LTD. and LEAF
11 IMAGING LTD. D/B/A MAMIYALEAF are foreign companies with places of business at Tokyo,
12 Japan and Tel Aviv, Israel, respectively, and MAMIYA AMERICA CORPORATION is a New
13 York corporation with a place of business at Elmsford, NY. Hereinafter, MAMIYA DIGITAL
14 IMAGING CO., LTD., LEAF IMAGING LTD. D/B/A MAMIYALEAF LEICA CAMERA AG and
15 MAMIYA AMERICA CORPORATION are collectively referred to as "MAMIYA."
16

17. On information and belief, MICRO ELECTRONICS, INC. D/B/A MICRO CENTER
18 (hereinafter "MICRO CENTER") is a Delaware corporation with a place of business at Hilliard,
19 OH.
20

21. On information and belief, NEWEGG, INC. is a Delaware corporation with a place
22 of business at Industry, CA. On information and belief, NEWEGG.COM, INC. is a Delaware
23 corporation with a place of business at Industry, CA. Hereinafter, NEWEGG, INC. and
24 NEWEGG.COM, INC. are collectively referred to as "NEWEGG."
25

26. On information and belief, NIKON CORPORATION is a foreign company with a
27 place of business at Tokyo, Japan and NIKON INC. and NIKON AMERICAS, INC. are New York
28

1 and Delaware corporations, respectively, with places of business at Melville, NY. Hereinafter,
2 NIKON CORPORATION, NIKON INC. and NIKON AMERICAS, INC are collectively referred to
3 as "NIKON."

4 17. On information and belief, OLYMPUS CORPORATION is a foreign company with
5 a place of business at Tokyo, Japan and OLYMPUS AMERICA INC. is a New York corporation
6 with a place of business at Center Valley, PA. Hereinafter, OLYMPUS CORPORATION and
7 OLYMPUS AMERICA INC. are collectively referred to as "OLYMPUS."

8 18. On information and belief, OVERSTOCK.COM, INC. (hereinafter "OVERSTOCK")
9 is a Delaware corporation with a place of business at Salt Lake City, UT.

10 19. On information and belief, PANASONIC CORPORATION is a foreign company
11 with a place of business at Osaka, Japan and PANASONIC CORPORATION OF NORTH
12 AMERICA is a Delaware corporation with a place of business at Seacaucus, NJ. Hereinafter,
13 PANASONIC CORPORATION and PANASONIC CORPORATION OF NORTH AMERICA are
14 collectively referred to as "PANASONIC."

15 20. On information and belief, RICOH COMPANY, LTD. and PENTAX RICOH
16 IMAGING CO., LTD. are foreign companies with places of business at Tokyo, Japan and RICOH
17 AMERICAS CORPORATION and PENTAX RICOH IMAGING AMERICAS CORPORATION
18 are Delaware corporations with places of business at West Caldwell, NJ and Denver, CO,
19 respectively. Hereinafter, RICOH COMPANY, LTD., PENTAX RICOH IMAGING CO., LTD.,
20 RICOH AMERICAS CORPORATION and PENTAX RICOH IMAGING AMERICAS
21 CORPORATION are collectively referred to as "PENTAX."

22 21. On information and belief, SAKAR INTERNATIONAL, INC. D/B/A VIVITAR
23 (hereinafter "VIVITAR") is a New York corporation with a place of business at Edison, NJ.

1 22. On information and belief, SIGMA CORPORATION is a foreign company with a
2 place of business at Kanagawa, Japan and SIGMA CORPORATION OF AMERICA is a New York
3 corporation with a place of business at Ronkonkoma, NY. Hereinafter, SIGMA CORPORATION
4 and SIGMA CORPORATION OF AMERICA are collectively referred to as "SIGMA."

5 23. On information and belief, SONY CORPORATION is a foreign company with a
6 place of business at Tokyo, Japan and SONY CORPORATION OF AMERICA and SONY
7 ELECTRONICS INC. are New York and Delaware corporations, respectively, with places of
8 business at New York, NY and San Diego, CA, respectively. Hereinafter, SONY CORPORATION,
9 SONY CORPORATION OF AMERICA and SONY ELECTRONICS INC. are collectively referred
10 to as "SONY."

11 24. On information and belief, TARGET CORPORATION D/B/A TARGET (hereinafter
12 "TARGET") is a Minnesota corporation with a place of business at Minneapolis, MN.

13 15 **JURISDICTION AND VENUE**

14 25. This action arises under the patent laws of the United States, Title 35 of the United
15 States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

16 26. On information and belief, the Defendants are subject to this Court's specific and/or
17 general personal jurisdiction, pursuant to due process and/or the California Long Arm Statute, due at
18 least to their substantial business in California, including related to the infringements alleged herein.
19 Further, on information and belief, Defendants have, within this forum, engaged in at least the
20 selling of the accused products listed herein. In addition, Defendants induce infringement of the
21 patent-in-suit by sellers and/or infringing users located in this forum. Further, on information and
22 belief, Defendants have interactive websites which are used in and/or accessible in this forum.
23 Further, on information and belief, Defendants regularly conduct and/or solicit business, engage in
24
25
26
27
28

1 other persistent courses of conduct, and/or derive substantial revenue from goods and services
2 provided to persons and/or entities in California.

3 27. Venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b).
4 Without limitation, on information and belief, Defendants are subject to personal jurisdiction in this
5 district. On information and belief, the Defendants are subject to this Court's specific and/or general
6 personal jurisdiction, pursuant to due process and/or the California Long Arm Statute, due at least to
7 their substantial business in this district, including related to the infringements alleged herein.
8 Further, on information and belief, Defendants have, within this forum, engaged in at least the
9 selling of the accused products listed herein. In addition, Defendants induce infringement of the
10 patent-in-suit by sellers and/or infringing users located in this forum. Further, on information and
11 belief, Defendants have interactive websites which are used in and/or accessible in this forum.
12 Further, on information and belief, Defendants regularly conduct and/or solicit business, engage in
13 other persistent courses of conduct, and/or derive substantial revenue from goods and services
14 provided to persons and/or entities in California.
15

16 **JOINDER**

17 28. On information and belief, joinder of at least B&H, CANON, NIKON, SONY,
18 PANASONIC, OLYMPUS, PENTAX, LEICA, CASIO, FUJIFILM, SIGMA, HASSELBLAD,
19 MAMIYA, GE and VIVITAR is proper under 35 U.S.C. § 299, at least due to B&H selling and/or
20 offering for sale accused products manufactured by at least CANON, NIKON, SONY,
21 PANASONIC, OLYMPUS, PENTAX, LEICA, CASIO, FUJIFILM, SIGMA, HASSELBLAD,
22 MAMIYA, GE and VIVITAR.
23

24 29. In addition, on information and belief, joinder of at least BEST BUY, CANON,
25 NIKON, SONY, PANASONIC, OLYMPUS, PENTAX, LEICA, FUJIFILM, GE, and VIVITAR is
26
27

1 proper under 35 U.S.C. § 299, at least due to BEST BUY selling and/or offering for sale accused
2 products manufactured by at least CANON, NIKON, SONY, PANASONIC, OLYMPUS,
3 PENTAX, LEICA, FUJIFILM, GE, and VIVITAR.

4 30. In addition, on information and belief, joinder of at least BUY.COM, CANON,
5 NIKON, SONY, PANASONIC, OLYMPUS, PENTAX, LEICA, CASIO, FUJIFILM, SIGMA,
6 AFGAPHOTO, GE, and VIVITAR is proper under 35 U.S.C. § 299, at least due to BUY.COM
7 selling and/or offering for sale infringing products named herein manufactured by at least CANON,
8 NIKON, SONY, PANASONIC, OLYMPUS, PENTAX, LEICA, CASIO, FUJIFILM, SIGMA,
9 AFGAPHOTO, GE, and VIVITAR.

10 31. In addition, on information and belief, joinder of at least CDW, CANON, NIKON,
11 SONY, PANASONIC, OLYMPUS, PENTAX and FUJIFILM s is proper under 35 U.S.C. § 299, at
12 least due to CDW selling and/or offering for sale infringing products named herein manufactured by
13 at least CANON, NIKON, SONY, PANASONIC, OLYMPUS, PENTAX and FUJIFILM.

14 32. In addition, on information and belief, joinder of at least MICROCENTER, CANON,
15 NIKON, SONY, OLYMPUS, FUJIFILM and GE s is proper under 35 U.S.C. § 299, at least due to
16 MICROCENTER selling and/or offering for sale infringing products named herein manufactured by
17 at least CANON, NIKON, SONY, OLYMPUS, FUJIFILM and GE.

18 33. In addition, on information and belief, joinder of at least NEWEGG, CANON,
19 NIKON, SONY, PANASONIC, OLYMPUS, PENTAX, FUJIFILM, AFGAPHOTO, GE, and
20 VIVITAR is proper under 35 U.S.C. § 299, at least due to NEWEGG selling and/or offering for sale
21 infringing products named herein manufactured by at least CANON, NIKON, SONY,
22 PANASONIC, OLYMPUS, PENTAX, FUJIFILM, AFGAPHOTO, GE, and VIVITAR.

34. In addition, on information and belief, joinder of at least OVERSTOCK, CANON, NIKON, PANASONIC, OLYMPUS, PENTAX and VIVITAR is proper under 35 U.S.C. § 299, at least due to OVERSTOCK selling and/or offering for sale infringing products named herein manufactured by at least CANON, NIKON, PANASONIC, OLYMPUS, PENTAX and VIVITAR.

35. In addition, on information and belief, joinder of at least TARGET, CANON, NIKON, SONY, PANASONIC, PENTAX, FUJIFILM, GE, and VIVITAR is proper under 35 U.S.C. § 299, at least due to TARGET selling and/or offering for sale infringing products named herein manufactured by at least CANON, NIKON, SONY, PANASONIC, PENTAX, FUJIFILM, GE, and VIVITAR.

36. In addition, on information and belief, joinder of these Defendants is proper under 35 U.S.C. § 299, at least because of the overlap in Defendants and infringing products noted in the paragraphs above, and due because questions of fact common to all Defendants will arise in this action due to the overlap in, and similarity between, infringing products. DIGITECH's rights to relief against Defendants depend upon the same transactions and occurrences related to the making, using, offering for sale and/or selling of the overlapping accused products.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,128,415

37. United States Patent No. 6,128,415 ("the '415 patent"), entitled "DEVICE PROFILES FOR USE IN A DIGITAL IMAGE PROCESSING SYSTEM," issued on October 3, 2000.

38. DIGITECH is the present assignee of the entire right, title and interest in and to the '415 patent, including all rights to sue for past and present infringement. Accordingly, DIGITECH has standing to bring this lawsuit for infringement of the '415 patent.

1 39. The various claims of the '415 patent cover, *inter alia*, a device profile for describing
2 properties of a device in a digital image reproduction system to capture, transform or render an
3 image, said device profile comprising: first data for describing a device dependent transformation of
4 color information content of the image to a device independent color space; and second data for
5 describing a device dependent transformation of spatial information content of the image in said
6 device independent color space.
7

8 40. On information and belief, AGFAPHOTO has been and now is infringing the '415
9 patent by actions comprising making, using, importing, selling and/or offering to sell products
10 comprising a device profile for describing properties of a device in a digital image reproduction
11 system to capture, transform or render an image, said device profile comprising: first data for
12 describing a device dependent transformation of color information content of the image to a device
13 independent color space; and second data for describing a device dependent transformation of spatial
14 information content of the image in said device independent color space.
15

16 41. Moreover, on information and belief, AGFAPHOTO has been and now is indirectly
17 infringing by way of intentionally inducing infringement of the '415 patent in this judicial district,
18 and elsewhere in the United States, including by aiding or abetting re-sellers, including but not
20 limited to BUY.COM and NEWEGG, to sell and/or offer for sale infringing products and/or
21 customers and/or users to use infringing products. Upon information and belief, such induced
22 infringement has occurred at least since this Defendant became aware of the '415 patent, at least
23 through becoming aware of this Complaint.
24

25 42. Upon present information and belief, AGFAPHOTO's infringing products comprise
26 at least the following accused products: SELECTA 16, OPTIMA 3, OPTIMA 145, OPTIMA 147,
27
28

1 OPTIMA 105, OPTIMA 104, OPTIMA 103, PRECISA 1430, Compact 103, Compact 102,
2 Compact 100 and DC-600uw.

3 43. AGFAPHOTO is thus liable for infringement of the '415 patent pursuant to 35
4 U.S.C. § 271.

5 44. On information and belief, B&H has been and now is infringing the '415 patent by
6 actions comprising making, using, importing, selling and/or offering to sell products comprising a
7 device profile for describing properties of a device in a digital image reproduction system to capture,
8 transform or render an image, said device profile comprising: first data for describing a device
9 dependent transformation of color information content of the image to a device independent color
10 space; and second data for describing a device dependent transformation of spatial information
11 content of the image in said device independent color space.

12 45. Moreover, on information and belief, B&H has been and now is indirectly infringing
13 by way of intentionally inducing infringement of the '415 patent in this judicial district, and
14 elsewhere in the United States, including by aiding or abetting customers and/or users to use the
15 infringing products. Upon information and belief, such induced infringement has occurred at least
16 since this Defendant became aware of the '415 patent, at least through becoming aware of this
17 Complaint.

18 46. Upon present information and belief, B&H's infringing products comprise at least the
19 following accused products: CANON: EOS-1D X, EOS-1Ds Mark III, EOS-1D Mark IV, EOS 5D
20 Mark II, EOS 5D Mark III, EOS 7D, EOS 60Da, EOS 60D, EOS Rebel T3i, EOS Rebel T2i, EOS
21 Rebel T3, PowerShot G1 X, PowerShot G12, PowerShot S100, PowerShot SX40 HS, PowerShot
22 SX260 HS, PowerShot SX230 HS, PowerShot SX150 IS, PowerShot ELPH 530 HS, PowerShot
23 ELPH 520 HS, PowerShot ELPH 510 HS, PowerShot ELPH 320 HS, PowerShot ELPH 110 HS,

1 PowerShot A4000 IS, PowerShot A3400 IS, PowerShot A2400 IS, PowerShot A2300, PowerShot
2 A1300, PowerShot A1200, PowerShot A810 and PowerShot A800; NIKON: Nikon 1 J1, Nikon 1
3 V1, D4, D800, D7000, D3100, D3200, D700, D3X, D300S, D90, D5100, COOLPIX P310,
4 COOLPIX S30, COOLPIX L810, COOLPIX AW100, COOLPIX S4300, COOLPIX L26,
5 COOLPIX P510, COOLPIX P7100, COOLPIX S100, COOLPIX S1200pj, COOLPIX S6300 and
6 COOLPIX S3300; SONY: alpha NEX-7, alpha NEX-5N, alpha NEX-C3, alpha NEX-F3, alpha a77,
7 alpha a65, alpha a57, alpha a37, Cyber-shot HX200V, Cyber-shot HX30V, Cyber-shot TX66,
8 Cyber-shot W650, Cyber-shot TX20, Cyber-shot HX10V, Cyber-shot H90, Cyber-shot WX150,
9 Cyber-shot WX70, Cyber-shot W690, Cyber-shot W620, Cyber-shot W610 and Cyber-shot WX50;
10 PANASONIC: LUMIX DMC-TS4, LUMIX DMC-ZS20, LUMIX DMC-ZS15, LUMIX DMC-SZ7,
11 LUMIX DMC-TS20, LUMIX DMC-SZ1, LUMIX DMC-FH8, LUMIX DMC-FH6, LUMIX DMC-
12 S2, LUMIX DMC-3D1K, LUMIX LX5, LUMIX FZ150K, LUMIX GF5, LUMIX GX1, LUMIX
13 GH2, LUMIX GF3 and LUMIX G3; OLYMPUS: VR-340, VG-160, Tough TG-1 iHS, Tough TG-
14 820 iHS, Tough TG-320, SZ-31MR iHS, SP-620UZ, SZ-12, SP-810UZ, SZ-20, XZ-1, E-P3, E-PL3,
15 E-PM1, E-M5 and E-5; PENTAX: OPTIO WG-2, OPTIO VS20, OPTIO WG-1, K-01, Q, K-30, K-
16 5, 645D, CX5, PX, GR Digital IV, G700SE and GXR; LEICA: V-LUX 40, V-LUX 3, X2, D-LUX
17 5, M9, M Monochrome and S2; FUJIFILM: FinePix X-S1, FinePix X10, FinePix X100, FinePix X-
18 Pro1, FinePix S4200, FinePix S4500, FinePix SL300, FinePix HS25EXR, FinePix HS30EXR,
19 FinePix F550EXR, FinePix F660EXR, FinePix F750EXR, FinePix F770EXR, FinePix Z90, FinePix
20 XP50, FinePix XP100, FinePix XP150, FinePix XP170, FinePix T350, FinePix T400, FinePix
21 JX500, FinePix JX580, FinePix JZ100, FinePix JZ250 and FinePix AX550; SIGMA: DP1x, DP2x,
22 SD15 and SD1; HASSELBLAD: H4D-31, H4D-40, H4D-40 Ferrari Edition, H4D-50, H4D-50MS,
23 H4D-60 and H4D-200MS; MAMIYA: Leaf Aptus-II 5 22 Digital Back, Leaf Aptus-II 7 33 Digital
24
25
26
27
28

1 Back, Leaf Aptus-II 8 40 Digital Back, Leaf Aptus-II 10 56 Digital Back, Leaf Aptus-II 12 80
2 Digital Back, Leaf Credo 40MP Digital Back, Leaf Credo 60MP Digital Back and Leaf Credo 80MP
3 Digital Back; GE: J1456W, E1450W, X500 and G100; VIVITAR: iTwist F124, ViviCam F128,
4 ViviCam F332, ViviCam F529, ViviCam T135, ViviCam T324, ViviCam T027, ViviCam X137,
5 ViviCam X029, ViviCam X028, ViviCam 9112, ViviCam 7122, iTwist 7028, ViviCam 7022,
6 ViviCam 8025, ViviCam 8018, ViviCam 8400, ViviCam 5118, ViviCam V25 and ViviCam 46.

7
8 47. B&H is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. § 271.

9
10 48. On information and belief, BEST BUY has been and now is infringing the '415
11 patent by actions comprising making, using, importing, selling and/or offering to sell products
12 comprising a device profile for describing properties of a device in a digital image reproduction
13 system to capture, transform or render an image, said device profile comprising: first data for
14 describing a device dependent transformation of color information content of the image to a device
15 independent color space; and second data for describing a device dependent transformation of spatial
16 information content of the image in said device independent color space.

17
18 49. Moreover, on information and belief, BEST BUY has been and now is indirectly
19 infringing by way of intentionally inducing infringement of the '415 patent in this judicial district,
20 and elsewhere in the United States, including by aiding or abetting customers and/or users to use the
21 infringing products. Upon information and belief, such induced infringement has occurred at least
22 since this Defendant became aware of the '415 patent, at least through becoming aware of this
23 Complaint.

24
25 50. Upon present information and belief, BEST BUY's infringing products comprise at
26 least the following accused products: CANON: EOS 5D Mark II, EOS 5D Mark III, EOS 7D, EOS
27 60D, EOS Rebel T1i, EOS Rebel T3i, EOS Rebel T2i, EOS Rebel T3, PowerShot G1 X, PowerShot

1 G12, PowerShot SX40 HS, PowerShot PowerShot SD1400 IS, PowerShot ELPH 530 HS,
2 PowerShot ELPH 520 HS, PowerShot ELPH 500 HS, PowerShot ELPH 320 HS, PowerShot ELPH
3 310 HS, PowerShot ELPH 110 HS, PowerShot ELPH 100 HS, PowerShot A4000 IS, PowerShot
4 A3400 IS, PowerShot A3300 IS, PowerShot A2400 IS, PowerShot A2300, PowerShot A2200,
5 PowerShot A1300, PowerShot A810 and PowerShot A495; NIKON: Nikon 1 J1, Nikon 1 V1, D4,
6 D800, D7000, D3100, D3200, D700, D300S, D90, D5100, COOLPIX P310, COOLPIX S30,
7 COOLPIX L810, COOLPIX AW100, COOLPIX S4300, COOLPIX L26, COOLPIX P510,
8 COOLPIX P7100, COOLPIX S8200, COOLPIX S1200pj, COOLPIX S9300, COOLPIX S6300,
9 COOLPIX S3300, COOLPIX S6200 and COOLPIX S4100; SONY: alpha NEX-7, alpha NEX-5N,
10 alpha NEX-C3, alpha NEX-F3, alpha a77, alpha a65, alpha a57, Cyber-shot HX200V, Cyber-shot
11 W650, Cyber-shot TX20, Cyber-shot HX10V, Cyber-shot H90, Cyber-shot WX150, Cyber-shot
12 W690, Cyber-shot W620, Cyber-shot W610 and Cyber-shot WX50; OLYMPUS: VR-350, VR-340,
13 VG-160, VR-330, VR-320, VR-310, Tough TG-1 iHS, Tough TG-820 iHS, Tough TG-320, Tough
14 TG-810, Tough TG-610, Tough TG-310, SP-620UZ, SZ-12, SP-810UZ, SP-610UZ, XZ-1, E-P3, E-
15 PL3, E-PM1, E-PL2, E-PL1, E-P2 and E-5; PENTAX: OPTIO WG-2, OPTIO VS20, K-01, Q, K-30
16 and K-5; LEICA: V-LUX 3; FUJIFILM: FinePix X-S1, FinePix X10, FinePix X100, FinePix X-
17 Pro1, FinePix W3 3D, FinePix S4200, FinePix S4500, FinePix SL300, FinePix HS25EXR, FinePix
18 HS30EXR, FinePix F660EXR, FinePix F750EXR, FinePix F770EXR, FinePix Z90, FinePix XP20,
19 FinePix XP30, FinePix XP50, FinePix XP100, FinePix XP150, FinePix T200, FinePix T350,
20 FinePix T400, FinePix JX500, FinePix JX580, FinePix JZ100, FinePix JZ250, FinePix JX350,
21 FinePix AX550 and FinePix AX300; GE: J1470S, A1456W, C1433, J1456W, E1410SW, E1450W,
22 X500 and G100; VIVITAR: ViviCam T027, ViviCam X029, ViviCam X327, ViviCam X018,
23 ViviCam 7022, ViviCam 8025, ViviCam 8018, ViviCam 8400, ViviCam 5118 and ViviCam V25.
24
25
26
27
28

1 51. BEST BUY is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. §
2 271.

3 52. On information and belief, BUY.COM has been and now is infringing the '415 patent
4 by actions comprising making, using, importing, selling and/or offering to sell products comprising
5 a device profile for describing properties of a device in a digital image reproduction system to
6 capture, transform or render an image, said device profile comprising: first data for describing a
7 device dependent transformation of color information content of the image to a device independent
8 color space; and second data for describing a device dependent transformation of spatial information
9 content of the image in said device independent color space.

10 53. Moreover, on information and belief, BUY.COM has been and now is indirectly
11 infringing by way of intentionally inducing infringement of the '415 patent in this judicial district,
12 and elsewhere in the United States, including by aiding or abetting customers and/or users to use the
13 infringing products. Upon information and belief, such induced infringement has occurred at least
14 since this Defendant became aware of the '415 patent, at least through becoming aware of this
15 Complaint.

16 54. Upon present information and belief, BUY.COM's infringing products comprise at
17 least the following accused products: CANON: EOS-1D Mark IV, EOS 5D, EOS 5D Mark II, EOS
18 5D Mark III, EOS 7D, EOS 60D, EOS D60, EOS Rebel T1i, EOS Rebel XS, EOS Rebel XSi,
19 Digital Rebel XTi, EOS Rebel T3i, EOS Rebel T2i, EOS Rebel T3, PowerShot G1 X, PowerShot
20 G1, PowerShot G9, PowerShot G10, PowerShot G11, PowerShot G12, PowerShot S100, PowerShot
21 S3 IS, PowerShot S90, PowerShot S100 Digital ELPH, PowerShot S95, PowerShot SX1 IS,
22 PowerShot SX20 IS, PowerShot SX30 IS, PowerShot SX40 HS, PowerShot SX110 IS, PowerShot
23 SX120 IS, PowerShot SX260 HS, PowerShot SX230 HS, PowerShot SX210 IS, PowerShot SX200
24
25
26
27
28

1 IS, PowerShot SX150 IS, PowerShot SX130 IS, PowerShot D20, PowerShot SD770 IS, PowerShot
2 SD780 IS, PowerShot SD790 IS, PowerShot SD940 IS, PowerShot SD970 IS, PowerShot SD980 IS,
3 PowerShot SD1300 IS, PowerShot SD1400 IS, PowerShot SD3500 IS, PowerShot SD4000 IS,
4 PowerShot SD4500 IS, PowerShot ELPH 530 HS, PowerShot ELPH 520 HS, PowerShot ELPH 500
5 HS, PowerShot ELPH 320 HS, PowerShot ELPH 310 HS, PowerShot ELPH 300 HS, PowerShot
6 A4000 IS, PowerShot A3400 IS, PowerShot A3300 IS, PowerShot A2400 IS, PowerShot A2300,
7 PowerShot A2200, PowerShot A1300, PowerShot A1200, PowerShot A810, PowerShot A800,
8 PowerShot A470, PowerShot A490, PowerShot A495, PowerShot A590 IS, PowerShot A650 IS,
9 PowerShot A720 IS, PowerShot A1000 IS, PowerShot A3000 IS, PowerShot A3100 IS and
10 PowerShot Pro 1; NIKON: Nikon 1 J1, Nikon 1 V1, D4, D800, D7000, D3100, D3200, D3S, D700,
11 D3X, D300S, D90, D5100, COOLPIX P310, COOLPIX S30, COOLPIX L810, COOLPIX AW100,
12 COOLPIX L26, COOLPIX P510, COOLPIX P7100, COOLPIX P500, COOLPIX S100, COOLPIX
13 S8200, COOLPIX S1200pj, COOLPIX S9300, COOLPIX S6300, COOLPIX S3300, COOLPIX
14 S6200, COOLPIX S6100, COOLPIX S4100, COOLPIX S3100, COOLPIX P300, COOLPIX
15 S9100, COOLPIX L120 and COOLPIX L24; SONY: alpha NEX-5N, alpha NEX-C3, alpha a77,
16 alpha a65, Cyber-shot HX200V, Cyber-shot HX30V, Cyber-shot TX66, Cyber-shot W650, Cyber-
17 shot TX200V, Cyber-shot TX20, Cyber-shot HX10V, Cyber-shot H90, Cyber-shot WX150, Cyber-
18 shot WX70, Cyber-shot W690, Cyber-shot W620, Cyber-shot W610 and Cyber-shot WX50;
19 PANASONIC: LUMIX DMC-TS4, LUMIX DMC-ZS20, LUMIX DMC-ZS15, LUMIX DMC-SZ7,
20 LUMIX DMC-TS20, LUMIX DMC-SZ1, LUMIX DMC-FH8, LUMIX DMC-FH6, LUMIX DMC-
21 S2, LUMIX DMC-3D1K, LUMIX LX5, LUMIX FZ47, LUMIX ZS10, LUMIX GF3 and LUMIX
22 GF2; OLYMPUS: VR-340, VG-160, VR-330, VR-320, VG-140, VG-120, VG-110, Tough TG-1
23 iHS, Tough TG-820 iHS, Tough TG-620 iHS, Tough TG-320, Tough TG-810, Tough TG-610,
24
25
26
27
28

1 Tough TG-310, SZ-31MR iHS, SP-620UZ, SZ-12, SP-810UZ, SZ-30MR, SZ-20, SZ-10, SP-
2 610UZ, XZ-1, E-P3, E-PL3, E-PM1, E-PL2, E-PL1, E-P2 and E-5; PENTAX: OPTIO WG-2,
3 OPTIO VS20, OPTIO RZ18, OPTIO WG-1, Q and K-R; LEICA: V-LUX 40, V-LUX 3, X1, D-
4 LUX 5 and M9; CASIO: EX-H20G; FUJIFILM: FinePix X10, FinePix X100, FinePix X-Pro1,
5 FinePix S2950, FinePix S3200, FinePix S4000, FinePix S4200, FinePix S4500, FinePix SL300,
6 FinePix HS20EXR, FinePix HS25EXR, FinePix HS30EXR, FinePix F500EXR, FinePix F550EXR,
7 FinePix F600EXR, FinePix F660EXR, FinePix F750EXR, FinePix F770EXR, FinePix Z90, FinePix
8 XP20, FinePix XP30, FinePix XP50, FinePix XP100, FinePix XP150, FinePix T200, FinePix T300,
9 FinePix T350, FinePix T400, FinePix JV200, FinePix JX500, FinePix JX580, FinePix JZ100,
10 FinePix JZ250, FinePix JX300, FinePix AX550, FinePix AX300 and FinePix AV200; SIGMA:
11 DP2x; AGFAPHOTO: PRECISA 1430; GE: J1470S, A1456W, E1410SW, E1486TW, X500, G100
12 and X5; VIVITAR: ViviCam T135, ViviCam X029, ViviCam X028, ViviCam X018, iTwist 7028,
13 ViviCam 8025, ViviCam 8690, ViviCam 8018, ViviCam 8400, ViviCam 5118, ViviCam 5024,
14 ViviCam 5028, ViviCam 5018, ViviCam 5399, ViviCam V25 and ViviCam V15.

17 55. BUY.COM is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. §
18 271.

20 56. On information and belief, CANON has been and now is infringing the '415 patent
21 by actions comprising making, using, importing, selling and/or offering to sell products comprising
22 a device profile for describing properties of a device in a digital image reproduction system to
23 capture, transform or render an image, said device profile comprising: first data for describing a
24 device dependent transformation of color information content of the image to a device independent
25 color space; and second data for describing a device dependent transformation of spatial information
26 content of the image in said device independent color space.

1 57. Moreover, on information and belief, CANON has been and now is indirectly
2 infringing by way of intentionally inducing infringement of the '415 patent in this judicial district,
3 and elsewhere in the United States, including by aiding or abetting re-sellers, including but not
4 limited to B&H, BEST BUY, BUY.COM, CDW, MICROCENTER, NEWEGG, OVERSTOCK and
5 TARGET, to sell and/or offer for sale infringing products and/or customers and/or users to use
6 infringing products. Upon information and belief, such induced infringement has occurred at least
7 since this Defendant became aware of the '415 patent, at least through becoming aware of this
8 Complaint.

9 58. Upon present information and belief, CANON's infringing products comprise at least
10 the following accused products: EOS-1D, EOS-1D Mark II, EOS-1D Mark II N, EOS-1D Mark III,
11 EOS-1D X, EOS-1Ds Mark II, EOS-1Ds Mark III, EOS-1D Mark IV, EOS 5D, EOS 5D Mark II,
12 EOS 5D Mark III, EOS 7D, EOS 60Da, EOS 60D, EOS 10D, EOS 20D, EOS 20Da, EOS 30D, EOS
13 40D, EOS 50D, EOS D30, EOS D60, EOS Digital Rebel, EOS Rebel T1i, EOS Rebel XS, EOS
14 Rebel XSi, Digital Rebel XT, Digital Rebel XTi, EOS Rebel T3i, EOS Rebel T2i, EOS Rebel T3,
15 PowerShot G1 X, PowerShot G1, PowerShot G2, PowerShot G3, PowerShot G5, PowerShot G6,
16 PowerShot G7, PowerShot G9, PowerShot G10, PowerShot G11, PowerShot G12, PowerShot S100,
17 PowerShot S1 IS, PowerShot S2 IS, PowerShot S3 IS, PowerShot S5 IS, PowerShot S10, PowerShot
18 S20, PowerShot S30, PowerShot S40, PowerShot S45, PowerShot S50, PowerShot S60, PowerShot
19 S70, PowerShot S80, PowerShot S90, PowerShot S100 Digital ELPH, PowerShot S110, PowerShot
20 S200, PowerShot S230, PowerShot S300, PowerShot S330, PowerShot S400, PowerShot S410,
21 PowerShot S500, PowerShot S95, PowerShot E1, PowerShot 350, PowerShot 600, PowerShot SX1
22 IS, PowerShot SX10 IS, PowerShot SX20 IS, PowerShot SX30 IS, PowerShot SX40 HS, PowerShot
23 SX100 IS, PowerShot SX110 IS, PowerShot SX120 IS, PowerShot TX1, PowerShot SX260 HS,
24
25
26
27
28

1 PowerShot SX230 HS, PowerShot SX210 IS, PowerShot SX200 IS, PowerShot SX150 IS,
2 PowerShot SX130 IS, PowerShot D20, PowerShot D10, PowerShot SD10, PowerShot SD20,
3 PowerShot SD30, PowerShot SD100, PowerShot SD110, PowerShot SD200, PowerShot SD300,
4 PowerShot SD400, PowerShot SD430, PowerShot SD450, PowerShot SD500, PowerShot SD550,
5 PowerShot SD600, PowerShot SD630, PowerShot SD700 IS, PowerShot SD750, PowerShot SD770
6 IS, PowerShot SD780 IS, PowerShot SD790 IS, PowerShot SD800 IS, PowerShot SD850 IS,
7 PowerShot SD870 IS, PowerShot SD880 IS, PowerShot SD 890 IS, PowerShot SD900, PowerShot
8 SD940 IS, PowerShot SD950 IS, PowerShot SD960 IS, PowerShot SD970 IS, PowerShot SD980 IS,
9 PowerShot SD990 IS, PowerShot SD1000, PowerShot SD1100 IS, PowerShot SD1200 IS,
10 PowerShot SD1300 IS, PowerShot SD1400 IS, PowerShot SD3500 IS, PowerShot SD4000 IS,
11 PowerShot SD4500 IS, PowerShot ELPH 530 HS, PowerShot ELPH 520 HS, PowerShot ELPH 510
12 HS, PowerShot ELPH 500 HS, PowerShot ELPH 320 HS, PowerShot ELPH 310 HS, PowerShot
13 ELPH 300 HS, PowerShot ELPH 110 HS, PowerShot ELPH 100 HS, PowerShot A4000 IS,
14 PowerShot A3400 IS, PowerShot A3300 IS, PowerShot A2400 IS, PowerShot A2300, PowerShot
15 A2200, PowerShot A1300, PowerShot A1200, PowerShot A810, PowerShot A800, PowerShot A5,
16 PowerShot A10, PowerShot A20, PowerShot A40, PowerShot A50, PowerShot A60, PowerShot
17 A70, PowerShot A75, PowerShot A80, PowerShot A85, PowerShot A95, PowerShot A100,
18 PowerShot A200, PowerShot A300, PowerShot A310, PowerShot A400, PowerShot A410,
19 PowerShot A420, PowerShot A430, PowerShot A460, PowerShot A470, PowerShot A480,
20 PowerShot A490, PowerShot A495, PowerShot A510, PowerShot A520, PowerShot A530,
21 PowerShot A540, PowerShot A550, PowerShot A560, PowerShot A570 IS, PowerShot A580,
22 PowerShot A590 IS, PowerShot A610, PowerShot A620, PowerShot A630, PowerShot A640,
23 PowerShot A650 IS, PowerShot A700, PowerShot A710 IS, PowerShot A720 IS, PowerShot A1000
24
25
26
27
28

1 IS, PowerShot A1100 IS, PowerShot A2000 IS, PowerShot A2100 IS, PowerShot A3000 IS,
2 PowerShot A3100 IS, PowerShot Pro 1, PowerShot Pro 70 and PowerShot Pro 90.

3 59. CANON is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. §
4 271.

5 60. On information and belief, CASIO has been and now is infringing the '415 patent by
6 actions comprising making, using, importing, selling and/or offering to sell products comprising a
7 device profile for describing properties of a device in a digital image reproduction system to capture,
8 transform or render an image, said device profile comprising: first data for describing a device
9 dependent transformation of color information content of the image to a device independent color
10 space; and second data for describing a device dependent transformation of spatial information
11 content of the image in said device independent color space.

12 61. Moreover, on information and belief, CASIO has been and now is indirectly
13 infringing by way of intentionally inducing infringement of the '415 patent in this judicial district,
14 and elsewhere in the United States, including by aiding or abetting re-sellers, including but not
15 limited to B&H and BUY.COM, to sell and/or offer for sale infringing products and/or customers
16 and/or users to use infringing products. Upon information and belief, such induced infringement has
17 occurred at least since this Defendant became aware of the '415 patent, at least through becoming
18 aware of this Complaint.

19 62. Upon present information and belief, CASIO's infringing products comprise at least
20 the following accused products: TRYX, EX-ZR-100, EX-H20G, EX-ZS10, EX-ZS5 and EX-H30.

21 63. CASIO is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. § 271.

22 64. On information and belief, CDW has been and now is infringing the '415 patent by
23 actions comprising making, using, importing, selling and/or offering to sell products comprising a
24

1 device profile for describing properties of a device in a digital image reproduction system to capture,
2 transform or render an image, said device profile comprising: first data for describing a device
3 dependent transformation of color information content of the image to a device independent color
4 space; and second data for describing a device dependent transformation of spatial information
5 content of the image in said device independent color space.
6

7 65. Moreover, on information and belief, CDW has been and now is indirectly infringing
8 by way of intentionally inducing infringement of the '415 patent in this judicial district, and
9 elsewhere in the United States, including by aiding or abetting customers and/or users to use the
10 infringing products. Upon information and belief, such induced infringement has occurred at least
11 since this Defendant became aware of the '415 patent, at least through becoming aware of this
12 Complaint.
13

14 66. Upon present information and belief, CDW's infringing products comprise at least
15 the following accused products: CANON: EOS-1D X, EOS-1D Mark IV, EOS 5D Mark II, EOS 5D
16 Mark III, EOS 7D, EOS Rebel T3i, EOS Rebel T2i, EOS Rebel T3, PowerShot G12, PowerShot
17 S100, PowerShot SX40 HS, PowerShot SX260 HS, PowerShot SX230 HS, PowerShot SX150 IS,
18 PowerShot SX130 IS, PowerShot D20, PowerShot ELPH 530 HS, PowerShot ELPH 520 HS,
19 PowerShot ELPH 320 HS, PowerShot ELPH 110 HS, PowerShot ELPH 100 HS, PowerShot A4000
20 IS, PowerShot A3400 IS, PowerShot A2400 IS, PowerShot A2300, PowerShot A2200, PowerShot
21 A1300 and PowerShot A810; NIKON: Nikon 1 J1, Nikon 1 V1, D800, D7000, D3100, D3200, D90,
22 D5100, COOLPIX P310, COOLPIX S30, COOLPIX L810, COOLPIX AW100, COOLPIX S4300,
23 COOLPIX L26, COOLPIX P510, COOLPIX P7100, COOLPIX S100, COOLPIX S1200pj,
24 COOLPIX S9300, COOLPIX S6300, COOLPIX S3300 and COOLPIX L24; SONY: alpha NEX-7,
25 alpha NEX-5N, alpha NEX-F3, alpha a77, alpha a65, alpha a57, alpha a37, Cyber-shot HX200V,
26
27
28

1 Cyber-shot HX30V, Cyber-shot TX66, Cyber-shot W650, Cyber-shot TX200V, Cyber-shot TX20,
2 Cyber-shot HX10V, Cyber-shot H90, Cyber-shot WX150, Cyber-shot WX70, Cyber-shot W690,
3 Cyber-shot W620, Cyber-shot W610 and Cyber-shot WX50; PANASONIC: LUMIX DMC-TS4,
4 LUMIX DMC-ZS20, LUMIX DMC-ZS15, LUMIX DMC-TS20, LUMIX DMC-SZ1, LUMIX
5 DMC-FH8, LUMIX DMC-FH6, LUMIX FZ47, LUMIX ZS10, LUMIX GX1 and LUMIX GF3;
6 OLYMPUS: VR-340, VG-160, VR-320, VG-120, Tough TG-1 iHS, Tough TG-820 iHS, Tough
7 TG-320, Tough TG-810, SZ-31MR iHS, SP-620UZ, SZ-12, SP-810UZ, SZ-10, XZ-1, E-P3, E-PL3,
8 E-PM1 and E-PL1; PENTAX: OPTIO WG-2, OPTIO WG-1 and K-R; FUJIFILM: FinePix X10,
9 FinePix W3 3D, FinePix S4500, FinePix F500EXR, FinePix F660EXR, FinePix XP30, FinePix
10 XP50, FinePix JX500 and FinePix AX550.
11

12 67. CDW is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. § 271.

13 68. On information and belief, FUJIFILM has been and now is infringing the '415 patent
14 by actions comprising making, using, importing, selling and/or offering to sell products comprising
15 a device profile for describing properties of a device in a digital image reproduction system to
16 capture, transform or render an image, said device profile comprising: first data for describing a
17 device dependent transformation of color information content of the image to a device independent
18 color space; and second data for describing a device dependent transformation of spatial information
19 content of the image in said device independent color space.
20

21 69. Moreover, on information and belief, FUJIFILM has been and now is indirectly
22 infringing by way of intentionally inducing infringement of the '415 patent in this judicial district,
23 and elsewhere in the United States, including by aiding or abetting re-sellers, including but not
24 limited to B&H, BEST BUY, BUY.COM, CDW, MICROCENTER, NEWEGG, and TARGET, to
25 sell and/or offer for sale infringing products and/or customers and/or users to use infringing
26 products and/or customers and/or users to use infringing products and/or customers and/or users to use
27 infringing products and/or customers and/or users to use infringing products and/or customers and/or users to use
28

1 products. Upon information and belief, such induced infringement has occurred at least since this
2 Defendant became aware of the '415 patent, at least through becoming aware of this Complaint.

3 70. Upon present information and belief, FUJIFILM's infringing products comprise at
4 least the following accused products: FinePix X-S1, FinePix X10, FinePix X100, FinePix X-Pro1,
5 FinePix W3 3D, FinePix S2950, FinePix S3200, FinePix S4000, FinePix S4200, FinePix S4500,
6 FinePix SL300, FinePix HS20EXR, FinePix HS25EXR, FinePix HS30EXR, FinePix F500EXR,
7 FinePix F550EXR, FinePix F600EXR, FinePix F660EXR, FinePix F750EXR, FinePix F770EXR,
8 FinePix Z90, FinePix Z900EXR, FinePix XP20, FinePix XP30, FinePix XP50, FinePix XP100,
9 FinePix XP150, FinePix XP170, FinePix T200, FinePix T300, FinePix T350, FinePix T400, FinePix
10 JV200, FinePix JX500, FinePix JX580, FinePix JZ100, FinePix JZ250, FinePix JX300, FinePix
11 JX350, FinePix AX550, FinePix AX300 and FinePix AV200.

12 71. FUJIFILM is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. §
13 271.

14 72. On information and belief, GE has been and now is infringing the '415 patent by
15 actions comprising making, using, importing, selling and/or offering to sell products comprising a
16 device profile for describing properties of a device in a digital image reproduction system to capture,
17 transform or render an image, said device profile comprising: first data for describing a device
18 dependent transformation of color information content of the image to a device independent color
19 space; and second data for describing a device dependent transformation of spatial information
20 content of the image in said device independent color space.

21 73. Moreover, on information and belief, GE has been and now is indirectly infringing by
22 way of intentionally inducing infringement of the '415 patent in this judicial district, and elsewhere
23 in the United States, including by aiding or abetting re-sellers, including but not limited to B&H,
24

1 BEST BUY, BUY.COM, MICROCENTER, NEWEGG, and TARGET, to sell and/or offer for sale
2 infringing products and/or customers and/or users to use infringing products. Upon information and
3 belief, such induced infringement has occurred at least since this Defendant became aware of the
4 '415 patent, at least through becoming aware of this Complaint.

5 74. Upon present information and belief, GE's infringing products comprise at least the
6 following accused products: J1470S, A1456W, C1433, J1455, J1456W, G5WP, G3WP, E1680W,
7 E1410SW, E1450W, E1486TW, E1480W, E1255W, X500, X400, G100, X5 and PJ1.

8 75. GE is thus liable for infringement of the '415 patent pursuant to 35 U.S.C. § 271.

9 76. On information and belief, HASSELBLAD has been and now is infringing the '415
10 patent by actions comprising making, using, importing, selling and/or offering to sell products
11 comprising a device profile for describing properties of a device in a digital image reproduction
12 system to capture, transform or render an image, said device profile comprising: first data for
13 describing a device dependent transformation of color information content of the image to a device
14 independent color space; and second data for describing a device dependent transformation of spatial
15 information content of the image in said device independent color space.
16

17 77. Moreover, on information and belief, HASSELBLAD has been and now is indirectly
18 infringing by way of intentionally inducing infringement of the '415 patent in this judicial district,
19 and elsewhere in the United States, including by aiding or abetting re-sellers, including but not
20 limited to B&H, to sell and/or offer for sale infringing products and/or customers and/or users to use
21 infringing products. Upon information and belief, such induced infringement has occurred at least
22 since this Defendant became aware of the '415 patent, at least through becoming aware of this
23 Complaint.
24
25
26
27
28